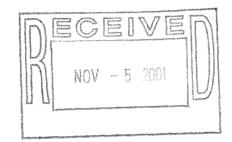


Innovative Nutrition Solutions

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October 24, 2001

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

<u>Vein Guard</u>®: [For] leg vein health. Vein Guard Horse Chestnut seed extract helps to maintain vascular integrity and enhance circulation in the lower legs. It also supports the elastic fibers in the vein wall to aid leg vein health. [It] works by helping to reduce fluid volume in the legs. Regular use of Vein Guard can promote comfort for heavy-feeling, tight and tired legs.

<u>Bilberry, Ginkgo Biloba, Co Q-10 [and] Vitamin C</u>: Healthy veins require high antioxidant levels and efficient circulatory flow. You can benefit from these Sundown products.

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Deborah Shur Trinker, Esquire

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Senior Vice President

Regulatory Affairs

Enclosure

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